

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re: :  
 : Chapter 13  
Sheila W. Santos-Silva :  
 : Bankruptcy No. 18-11455 (AMC)  
Debtor. :  
-----X

**NOTICE OF APPEARANCE AND REQUEST FOR ALL NOTICES**

PLEASE TAKE NOTICE THAT Megan N. Harper enters her appearance as counsel for the City of Philadelphia/School District of Philadelphia (“City”) in the above-captioned case, pursuant to section 1109(b) of Title 11 of the United States Code (the “Bankruptcy Code”); and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); such counsel hereby requests, pursuant to Bankruptcy Rules 2002 and 9007 and sections 342 and 1109(b) of the bankruptcy Code, that all notices and pleadings given or filed in the above-captioned case be given and served upon the following:

Megan N. Harper  
Senior Attorney  
City of Philadelphia Law Department  
Municipal Services Building  
1401 JFK Boulevard, 5<sup>th</sup> Floor  
Philadelphia, PA 19102-1595  
215-686-0503 (phone)  
Email: [Megan.Harper@phila.gov](mailto:Megan.Harper@phila.gov)

Please take notice that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Code and the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, the schedules, statement of financial affairs, operating reports, plans of reorganization and disclosure statement, and any notice, application, complaint, demand, motion, petition, pleading, or request, whether formal or informal, written or oral, and

whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise that is filed with regard to the referenced cases and the proceedings therein.

Please take further notice that this entry of appearance is not intended as, nor is it a consent to, jurisdiction of the Bankruptcy Court, and the City does not hereby waive any rights, including but not limited to (i) the right to have final orders in non-core matters entered only after de novo review by a district judge; (ii) the right to a trial by jury in any proceeding so triable herein, or in any case, controversy, or proceeding related hereto; (iii) the right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the City is or may be entitled under agreement, in law or equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the City expressly reserves.

Respectfully submitted,

THE CITY OF PHILADELPHIA

Dated: June 23, 2023

By: /s/ Megan N. Harper  
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*Counsel for the City of Philadelphia/School  
District of Philadelphia*